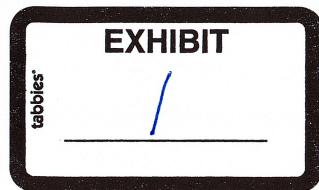


Friday, December 17, 2021 at 10:20:29 Central Standard Time

**Subject:** Re: Gilbert  
**Date:** Sunday, December 12, 2021 at 1:44:22 PM Central Standard Time  
**From:** Darrell Downs  
**To:** Preston Dugas, Terry M McKeever, Jacob Daniel  
**Attachments:** image001.png, image002.png


 EXHIBIT

Ok. Will do. Thanks Preston.

---

**From:** Preston Dugas <preston@pjdlawfirm.com>  
**Date:** Sunday, December 12, 2021 at 1:42 PM  
**To:** Darrell Downs <DDowns@soonerlaw.com>, Terry M McKeever <tmm@fylaw.com>, Jacob Daniel <jdaniel@soonerlaw.com>  
**Subject:** RE: Gilbert

Notice it, and we can go from there.

**Preston J. Dugas III**  
 Attorney



Preston Dugas  
 Law Firm, PLLC

**1701 River Run, Suite 703**  
**Fort Worth, TX 76107**  
 Tel: 817.945.3061 | Fax: 682.219.0761 | Email: [preston@pjdlawfirm.com](mailto:preston@pjdlawfirm.com)  
[www.pjdlawfirm.com](http://www.pjdlawfirm.com)  
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Preston Dugas Law Firm, PLLC has announced the addition of two new Law Partners, Lyndsey Cheek and Vincent Circelli. The Law Firm will be officially changing its name to Dugas, Cheek & Circelli, PLLC and each employee will be operating under a new email address. **My new email address starting January 10, 2022 will be [pdugas@dcclawfirm.com](mailto:pdugas@dcclawfirm.com).** Please make a note of this for your file and starting on January 10, 2022 use this new email address for all communication and service of documents.

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**From:** Darrell Downs <DDowns@soonerlaw.com>  
**Sent:** Friday, December 10, 2021 2:44 PM  
**To:** Preston Dugas <preston@pjdlawfirm.com>; Terry M McKeever <tmm@fylaw.com>; Jacob Daniel <jdaniel@soonerlaw.com>  
**Subject:** Re: Gilbert

Preston,

I have no objection to you and/or Terry appearing by zoom, but this is the one deposition that we need in person due to all the weather radar imaging prints. Accordingly, it appears we will need court guidance on this issue. I suggest I send you a notice for the deposition and then you file your motion for protective order so it will be placed before the court for ruling. Let me know if this is how you wish for us to proceed. Thanks.

Darrell

---

**From:** Preston Dugas <[preston@pjdlawfirm.com](mailto:preston@pjdlawfirm.com)>

**Date:** Thursday, December 9, 2021 at 9:09 AM

**To:** Darrell Downs <[DDowns@soonerlaw.com](mailto:DDowns@soonerlaw.com)>, Jacob Daniel <[jdaniel@soonerlaw.com](mailto:jdaniel@soonerlaw.com)>, Paige Broyles <[pbroyles@soonerlaw.com](mailto:pbroyles@soonerlaw.com)>

**Cc:** Terry M McKeever <[tmm@fylaw.com](mailto:tmm@fylaw.com)>

**Subject:** RE: Gilbert

Darrell,

Please make sure to include Terry. He's actually defending the deposition and is my co-counsel on this case.

Can we agree to conduct this one deposition via Zoom and all others in person?

Lastly, I do not represent Dr. Altschule. I will be responding to any subpoena though.

**Preston J. Dugas III**

Attorney



Preston Dugas  
Law Firm, PLLC

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**Fort Worth, TX 76107**

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**From:** Darrell Downs <[DDowns@soonerlaw.com](mailto:DDowns@soonerlaw.com)>

**Sent:** Thursday, December 9, 2021 8:49 AM

**To:** Preston Dugas <[preston@pjdlawfirm.com](mailto:preston@pjdlawfirm.com)>; Jacob Daniel <[jdaniel@soonerlaw.com](mailto:jdaniel@soonerlaw.com)>; Paige Broyles <[pbroyles@soonerlaw.com](mailto:pbroyles@soonerlaw.com)>

**Subject:** Gilbert

Preston,

I need to get a subpoena out to Altschule if you are not representing him for the deposition so let me know.  
Thanks.

Darrell